

February 27, 2022

Honorable Brian M. Cogan  
United States District Judge for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York, 11201

Re: United States v. Colinford Mattis, 20 Cr. 203 (BMC)

Your Honor:

I write on behalf of Colinford Mattis to request a 45-day adjournment of sentencing, currently scheduled for March 8, 2022, and a 10-day extension of time within which to submit our objections to the first disclosure of the Pre-Sentence Report. Should the Court grant the requested adjournments, the sentencing for Mr. Mattis and Ms. Rahman would occur on dates after April 22, 2022, that is convenient for the Court, and our objections to the first disclosure of the PSR would be due on March 18, 2022. Our preference is for Ms. Rahman to be sentenced first. I have conferred with counsel for Ms. Rahman, who joins in this request.

The parties received the first disclosure of the Pre-Sentence Reports on February 22, 2022. In light of the complicated sentencing guidelines issues, an additional 10 days is needed for us to properly prepare our objections to the Probation Department. In addition, the requested 45-day adjournment of sentencing is intended to provide Probation with sufficient time to consider the parties' objections to the initial Pre-Sentence Reports, and to provide the parties with time to address Probation's resolution of such objections in their sentencing submissions. This is defense's first request for an adjournment.

Defense counsel has conferred with the government (AUSA Ian Richardson), which does not oppose this request.

I thank the Court for its consideration of this matter.

Respectfully submitted,

/s/Sabrina P. Shroff  
Adam Z. Margulies  
Attorneys for Colinford Mattis

cc: Department of Probation